



ORIGINAL

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

COMMONWEALTH OF PENNSYLVANIA, CRIMINAL DIVISION

v.

CC No.: 2012 02820

THADDEUS THOMAS CRUMBLEY,
Defendant.

THE HONORABLE BETH LAZZARA

**POST-VERDICT MOTION:
MOTION FOR EXTRAORDINARY
RELIEF**

Filed on Behalf of Defendant:

Thaddeus Thomas Crumbley

Counsel of Record for this Party:

Wendy L. Williams
PA ID# 50379

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FILED

2012 SEP 14 PM 3:02

DEPT. OF COURT RECORDS
CRIMINAL DIVISION
ALLEGHENY COUNTY PA

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

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THADDEUS THOMAS CRUMBLEY, THE HONORABLE BETH LAZZARA
Defendant.

MOTION FOR EXTRAORDINARY RELIEF

AND NOW, comes the Defendant, Thaddeus Crumbley, by and through his attorney, Wendy L. Williams, and avers the following:

1. The Prosecution in this case acted improperly and with extreme prejudice by making biblical reference to the Defendant as "The Angel of Death" in his closing while gesturing in close proximity to the Defendant.
2. Counsel for Defendant did not object or ask for a mistrial or cautionary instruction to what amounted to prosecutorial misconduct.
3. There was insufficient evidence to convict the Defendant. The verdict was against the weight of the evidence.
4. The Defendant was prevented from having a fair trial because he was not provided with full discovery, including critical identification procedures and photo arrays used in the investigation against him. The Commonwealth provided the Defendant with some well after the pretrial motions on said evidence was heard and late in the trial.
5. Commonwealth witnesses and detectives testified about photographs and photos being shown and introduced a new photo array in which the Defendant was not identified.
6. This exculpatory evidence was not given to the Defendant in a timely manner.
7. The Commonwealth withheld critical evidence and discovery information that prevented the Defendant from receiving a fair trial.

WHEREFORE, based on the within reasons the Defendant requests that Extraordinary Relief/a new trial be granted forthwith.

Respectfully Submitted



Wendy L. Williams

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

COMMONWEALTH OF PENNSYLVANIA, CRIMINAL DIVISION

v.

CC No.: 2012 02820

THADDEUS THOMAS CRUMBLEY,
Defendant.

PRELIMINARY ORDER OF COURT

AND NOW, to-wit, upon consideration of the foregoing Motion for Extraordinary Relief
it is hereby ORDERED, ADJUDGED and DECREED that a hearing be held on the _____ day
of _____, 2012 at _____ A.M./P.M.

BY THE COURT:

_____, J.

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA
COMMONWEALTH OF PENNSYLVANIA, CRIMINAL DIVISION

v.

CC No.: 2012 02820

THADDEUS THOMAS CRUMBLEY, THE HONORABLE BETH LAZZARA
Defendant.

ORDER OF COURT

AND NOW, to-wit, this _____ day of _____, 2012, it is hereby
ORDERED , ADJUDGED, AND DECREED that the Motion for Extraordinary Relief on the
above captioned case is hereby:

BY THE COURT:

_____, J.

CERTIFICATE OF SERVICE

I, Wendy L. Williams, hereby certify that a true and correct copy of the within Motion for Extraordinary Relief was served in the manner indicated, this 14th day of September, 2012 upon the following:

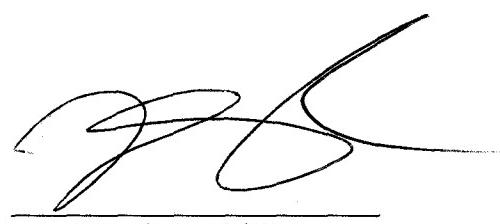
The Honorable Beth Lazzara
510 Allegheny County Courthouse
436 Grant Street
Pittsburgh, PA 15219
Via Hand Delivery

DDA Steven Stadtmiller
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Via Hand Delivery and Email

Helen Lynch, Court Administrator
Allegheny County Courthouse
436 Grant Street
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Via Hand Delivery

Randall McKinney, Esquire
c/o Allegheny County Conflict Counsel
429 Forbes Avenue, Suite 1400
Pittsburgh, PA 15219
Via U.S. Mail

Mr. Thaddeus Thomas Crumbley, DOC# 69038
c/o Allegheny County Jail
950 2nd Avenue
Pittsburgh, PA 15219
Via U.S. Mail



Wendy L. Williams